

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOHN MADIGAN,  
Plaintiff

v.

GENERAL STAR INDEMNITY CO.,  
Defendant

CIVIL ACTION NO. 04-cv-12665-DPW

**DEFENDANT'S CERTIFICATION PURSUANT TO LOCAL RULE 16.1**

The undersigned hereby affirm that they have conferred with a view to establishing, insofar as it is possible at this preliminary stage, a budget for the cost of conducting the full course - and various alternative courses - of the litigation; and to consider the resolution of the litigation through the use of Alternative Dispute Resolution programs.

GENERAL STAR INDEMNITY COMPANY,

By: /s/ John G. Carroll

John G. Carroll

Vice President and Claim Counsel of General Star  
Management Co., the managing general agent of  
General Star Indemnity Company

/s/ Samuel M. Furgang

Samuel M. Furgang, BBO #559062

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Dated: February 2, 2005